

From: Robinson, Valois <Robinson.Valois@epa.gov>
Sent: Thursday, January 25, 2018 9:59 AM
To: John Mays
Cc: Minter, Douglas
Subject: Dewey-Burdock web conference list of topics - updated

Hi John,

This is the same list as before, but I thought it would be helpful to include the specific topics within the 2015 PEA.

1) Operating plans in the 2015 PEA that are different from the Class III permit application

a. Figure 1.3: Life of Mine Schedule

- Production: Q3 Year 1 - Q2 Year 12 = 11 years
- Last Quarter of Restoration: Q1 Year 13
- Timeframe for the operation of Class V wells based on beginning of Class III well construction through end of restoration:
wellfield construction: Q1 Year 1 - last quarter restoration: Q1 year 13 = 13 years
- Class III Permit App Figure 10.2: Projected... Schedule
Production: Q1 Year 2 - Q4 Year 9 = 9 years
- Timeframe for Class V well operation:
 - wellfield construction: Q1 Year 1 - last quarter restoration: Q1 year 10 = 10 years
 - we used 12 years in the Class V permit and fact sheet
- CEA comment Table 4, C25 about sequence of wellfield development-indicates this schedule maybe still flexible?

b. Figure 1.2: Project Site Map

- Wellfield configuration changes: Burdock wellfields 6, 7, 8, 9
- Wellfield ore zone changes: wellfield 8, 9 and 11
- After permit modification in Year 7: Expansion of Dewey wellfield 1 and addition of Dewey wellfield 5

c. Sections 1.3 Project and 16.3 Mine Development reference 4,000 gpm flow rate

- Is the maximum production flow rate going to be 4,000 gpm, consistent with the NRC license?
- No longer considering requesting license amendment to increase production flow rate to 8,000 gpm?
- If 4,000 gpm, rethink Figure 7.1 Typical Project-wide Flow Rates during Uranium Recovery and Aquifer Restoration?

d. Section 7.4 Hydrogeological Setting mentions: "...completion of regional and well field scale groundwater models." Review list of models developed

e. Table 16.1: Well Field Inventory

Dewey WF2 and WF4: number of proposed injection wells doesn't quite fit the ratio of 40 injection wells per header house.

f. Question: 7.2 Local and Project Geology: "The Lakota formation in the Dewey-Burdock Project area was deposited by a northward flowing stream system." Is this true?

g. Any other changes I didn't list here?

- 2) Azarga's plans for well 16
- 3) Class III permit requirements for step rate tests
- 4) Explanation of process for the proposed bounding analysis to demonstrate manifold monitoring is equivalent to wellhead monitoring.
- 5) Well construction options
- 6) Explanation of trend wells & the info they provide
- 7) Measuring drawdown during pump tests and how changes in barometric pressure can be distinguished from actual draw down of the aquifer potentiometric surface in order to address

Thanks!

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